Comment on Docket 99-25 (LPFM)

LPFM represents an unprecedented opportunity to offer exposure to the vast wealth of creative musical expression that already exists but remains unheard due to the detrimental stranglehold of market-based consumer-driven commercial radio. All of popular culture is stunted by the narrow, money-driven focus of so-called popular radio and its promotional ties with commercial industries.

It is an unfortunate fact that only a slim portion of the population is lucky enough to be within the broadcast range of a free-form college radio station or other outlet for independent music and viewpoints. Thus the majority of radio listeners are never given a chance to sample anything outside the standard, accepted and popular, even though the selections and opinions repeatedly aired on commercial radio represent but a mere fraction of the thoughts and music being created, even within the same genre. LPFM could change that.

LPFM would open the airwaves to the energy and enthusiasm that exists in those who have continued to champion independent music amidst decades of deterrents. LPFM will not be the demise of commercial radio, it will merely add a tiny new voice to the fray. By making the airways available to programming interests that have concerns outside the commercial-radio norm is absolutely essential to stem the degenerating tide of our national cultural awareness.

As a Board Member of a Corporation that holds the operating license of 720 Watt Class-A station I have a full understanding of the current structure of FM radio and its place in an urban community with already-crowded airwaves. Despite contrary comments from the establishment, it is my educated opinion that LPFM would be good for everyone because it would give exposure to different ideas, allow truly alternative approaches to programming, and provide a forum for under-exposed music, all of which would be an overall positive experience for the majority of the listening audience.

As a weekly radio host and programmer with 15 years of experience in all aspects of the underdog world of college radio, I can say with certainty that there is enormous interest in a multitude of independent music styles that are never allowed airtime on commercial radio. Existing stations simply do not even attempt to address the requests of the under-acknowledged community of independent music fans. It is a misnomer to relegate non-commercial music to an underground or counter-culture as the interests of all would be better served by exposure to greater diversity.

As a hobbyist musician and participant in the creation of numerous recordings of underground music, I have first hand experience with the plethora of difficulties of gaining initial exposure to potential fans. But as a testament to the under-representation of the standard commercial fodder, I can happily say that with perseverance, it has been possible to operate outside the realm of commercialism and still accrue an international audience that is not of insignificant size. It is simply not valid to assert that commercial radio caters to popular preferences, as it is apparent that popularity is a relative term and the disenfranchised are in actually the silent majority.

Finally, as the owner and operator of a not-for-profit record label created for the sole purpose of providing exposure to exceptional music that would otherwise be stifled, I have expended great

effort attempting to break through the barriers imposed by the intrinsic monopoly that links mainstream media with commercial music. Even within a purportedly progressive civic environment the overwhelming response of local press is to mollycoddle the commercial majority and rebuff productions by local independents. In the face of such constraints it is exceedingly difficult for independent music to gain enough exposure to sustain an awareness of its existence or gain a wider audience and acceptance. The increased exposure of independent music afforded by the LPFM format would help overcome the prejudices of a peer-pressure society that popularizes consumerism conformity.

LPFM would provide, nationwide, a much needed opening for radio programming that is tuned to the desires of the real community and not the driving decisions of advertising and profiteering.

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